

EXHIBIT A

From: [Noam Biale](#)
To: ["Busen, Jesse \(CIV\)"; Xiangnong Wang; Courtney Gans; Murphy, Lindsay M. \(CIV\); Jackson Busch; jameel.jaffer; Michael Tremonte; Ramya Krishnan; Scott Wilkens; Talya R Nevins; Alexander A Abdo; Alexandra Conlon](#)
Cc: [Kanter, Ethan \(CIV\); Santora, Victoria M \(CIV\); Stone, Paul \(CIV\); Strokus, Jessica D. \(CIV\); Murphy, Lindsay M. \(CIV\); Hennes, Stefanie \(CIV\); Safavi, Nancy \(CIV\); Kanellis, William G. \(CIV\); Moss, Benjamin M. \(CIV\); Hockenberry, Tia \(CIV\)](#)
Subject: Scheduling remaining depositions
Date: Friday, June 27, 2025 4:53:42 PM
Attachments: [image001.jpg](#)
[image002.jpg](#)
[image003.jpg](#)
[image004.jpg](#)
[06.27.2025 - Deposition Notice - Maureen Smith.pdf](#)
[06.27.2025 - Deposition Notice - Crogan.pdf](#)
[06.27.2025 - Deposition Notice - Cunningham.pdf](#)
[06.25.2025 - Deposition Notice - McCormack.pdf](#)

Good afternoon,

We are writing to confirm and notice the final remaining depositions before trial and to discuss scheduling the trial testimony of Pete Hatch and John Armstrong.

Plaintiffs' Witnesses

You have noticed depositions for Jeff Rieger, Nadjia Al-Ali, and Nadia Abu El-Haj. We can confirm Jeff Rieger on 7/1 in D.C. and Nadjia Al-Ali on 7/2 in Boston.

Regarding Nadia Abu El-Haj, you requested 7/4, which we asked to modify, but we can make your original date work—we just ask to begin very early that day (like 6AM) because she is in Beirut, which is seven hours ahead.

Defendants' Witnesses

We have noticed Jessica Norris and understand she is available for the full day on 7/3. Please confirm that we are set to depose her on the 3rd, as discussed.

We now additionally notice depositions for following persons identified in Mr. Hatch's deposition and in the government's pretrial memo on the following dates:

- ASAC Crogan **or** Cunningham in Boston anytime on Monday 6/30 and Wednesday 7/2 (we will take whoever is available on either day, and we can start on anytime on 6/30. For 7/2, we would start after Ms. Al-Ali).
- DSAC McCormack – 7/1 in New York, anytime (we could also do it on 7/3 if that does not work)
- Maureen Smith in D.C. on 7/2 (we can accommodate alternate dates if needed).

Please confirm the dates and times for the depositions that have already been arranged, and please let us know as soon as you are able about the depositions we are noticing now.

Scheduling of Witnesses for Trial

-
We intend to call Pete Hatch at trial on **Wednesday, 7/9**. Please confirm you will make him available that day.

With respect to John Armstrong, since you have indicated you are calling him as a defense witness at trial, we will take him off of our witness list. Please confirm that you will call him in the defense case (an, obviously, it will be up to you when to call him).

Thanks,
Noam



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From: Busen, Jesse (CIV) <Jesse.Busen@usdoj.gov>

Sent: Friday, June 27, 2025 4:06 PM

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<Tia.Hockenberry@usdoj.gov>

Subject: RE: AAUP - Motion to seal

— —
Thanks, Noam.

On the joint motion to seal, I will get back to you as soon as I have an answer.

Jesse

From: Noam Biale <NBiale@shertremonte.com>

Sent: Friday, June 27, 2025 4:04 PM

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Subject: [EXTERNAL] RE: AAUP - Motion to seal

Hi Jesse,

That's fine. On the question of filing under seal, could you also respond to my previous email about the pretrial briefs?

Thanks,
Noam



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Subject: AAUP - Motion to seal

Noam and all,

We plan to file the entirety of the Armstrong depo transcript as an exhibit to our response to the motion to compel this evening. Because it is marked confidential, we will be filing it under seal. Do you have any opposition to this?

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